National Wildlife Federation
National Advocacy Center
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September 8, 2020

Mr. Andrew Wheeler, Administrator
Environmental Protection Agency
1200 Pennsylvania Ave. NW
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Re: Comments on dicamba, and the need to not renew product registrations until more research verifies safety.

Dear Administrator Wheeler,

On behalf of National Wildlife Federation (NWF) and our six million members and supporters, I am submitting these comments concerning the need for the U.S. Environmental Protection Agency (EPA) to take strong action on the herbicide dicamba in order to protect human health and the environment. We urge EPA to decline registration renewal for dicamba-containing products, in particular XtendiMax (manufactured by Bayer), Engenia (BASF), FeXapan (Corteva) and Tavium (Syngenta), including ending the over-the-top use of these products on crops, until research confirms the products can be used in a manner that does not threaten human health or the environment. In addition to this letter, 18,174 NWF members have signed onto comments calling on EPA to take strong action on dicamba (see attached).

We recognize that on June 3, 2020, the Ninth Circuit Court of Appeals issued an order vacating EPA's pesticide registrations of products containing the active ingredient dicamba, including Xtendimax with Vaporgrip Technology (EPA Reg. No. 524-617); Engenia (EPA Reg. No. 7969-345); and FeXapan (EPA Reg. No. 352-913). In response to the court decision, EPA issued its *Final Cancellation Order for Three Dicamba Products (Xtendimax with Vaporgrip Technology, Engenia, and FeXapan)*, on June 10, 2020, including prohibitions on sale or distribution of the products, and restrictions on the disposition of existing stocks at the time of the order.[1]

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[1] U.S. Environmental Protection Agency (USEPA), 2020. Final Cancellation Order for Three Dicamba Products (Xtendimax with Vaporgrip Technology, Engenia, and FeXapan), available from https://www.epa.gov/ingredients-used-pesticide-products/final-cancellation-order-three-dicamba-products

The threats of dicamba to the environment have become increasingly clear, with publication of research results finding risks to many species. These risks and other challenges with dicamba were summarized in the report *Drifting Toward Disaster: How Dicamba Herbicides are Harming Cultivated and Wild Landscapes*, released last month by NWF, Prairie Rivers Network, and Xerces Society for Invertebrate Conservation.[2] The report documents the risks from the pesticide product use on dicamba-resistant crops, including soybeans, cotton, and wheat. Given the relatively high volatility of dicamba, herbicide drift is common, and impacts to both other crops and nearby natural areas has been documented. The recent rise in dicamba use has been accompanied by increased complaints about drift injury to sensitive crops, trees, gardens and apiaries. Dicamba herbicides continue to volatilize and move long distances, and while some research has been done, more is needed to address impacts to wildlife and pollinators affected by dicamba-damaged vegetation and long-term ecological impacts of repeated exposure to this herbicide.

There are many potential ecological impacts of dicamba use. Volunteer monitoring efforts by NWF's affiliate group Prairie Rivers Network have documented injury to numerous tree species, including redbud, oaks, hickory, and elm species.[3] The *Drifting Toward Disaster* report also noted dicamba risk to bees and other pollinators, including direct risks (e.g. to lady beetles) as well as indirect risks, such as loss of flowering plants important as food sources for many insects. Similarly, some bird species are at risk from dicamba, whether through ingestion of contaminated seeds, reduced food availability via declining insect populations, or via reduction in key habitat components (e.g. vegetative cover).[4] Though more research is needed, some research has shown dicamba impacts to other wildlife, including for example additive toxicity effects in some cases for combinations of dicamba and glyphosate in *Rhinella Arenarum* tadpoles.[5] In spite of increasing research on the off-target risks of dicamba use, there is still much that is not known, as documented in *Drifting Toward Disaster*, including further questions about human health risks, as well as multiple unknowns about ecological risks, including threats from multiple agrochemicals and other stressors such as diseases and climate change.[6]

Given the ongoing uncertainties around the health and ecological risks from dicamba, and in light of the June 2020 Ninth Circuit Court decision and subsequent cancellation order by EPA regarding three dicamba products, the National Wildlife Federation supports a decision to decline registration renewal for all dicamba products, including ending the over-the-top use of products on crops, until further research – including more thorough ecological risk assessments – confirm dicamba products can be used in a way that does not threaten human health, or contribute to damage terrestrial and aquatic ecosystems already suffering from multiple chemical and other stressors. Instead, EPA should be working with other agencies to promote adoption of agricultural practices that can lead to sufficient food production while reducing risks to human health and the environment.

Sincerely,

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National Wildlife Federation

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[2] Knuffman, L., Erndt-Pitcher, K., May, E. 2020. *Drifting Toward Disaster: How Dicamba Herbicides are Harming Cultivated and Wild Landscapes*. Washington, D.C.: National Wildlife Federation; Champaign, IL: Prairie Rivers Network; Portland, OR: Xerces Society for Invertebrate Conservation.

[3] Knuffman et al., 2020, *Op. Cit.*

[4] Ibid.

[5] de Arcaute, C. R., Brodeur, J. C., Soloneski, S., & Larramendy, M. L. (2020). Toxicity to Rhinella arenarum tadpoles (Anura, Bufonidae) of herbicide mixtures commonly used to treat fallow containing resistant weeds: glyphosate-dicamba and glyphosate-flurochloridone. *Chemosphere, 245*, 9. doi:10.1016/j.chemosphere.2019.125623.

[6] Knuffman et al., 2020, Op. Cit.